

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

---

UNITED STATES OF AMERICA,

*Plaintiff,*

*vs.*

Case No. 20-CR-26

YOUSEF BARASNEH,

*Defendant.*

---

**UNOPPOSED MOTION TO AMEND CONDITIONS OF  
RELEASE TO ALLOW FOR TRAVEL OUT OF DISTRICT**

Yousef Barasneh moves this Court to amend his conditions of release to allow him to travel out of the district from Friday, May 19, to Sunday, May 21, 2023. As grounds for this motion, undersigned counsel states the following:

1. Yousef Barasneh was released to bond at his initial appearance on January 17, 2020. He entered a guilty plea on August 12, 2020, to count one of the Information. Barasneh has remained compliant with bond conditions since at least August of 2021, and previously the Court has allowed him to travel to the same location in the Western District of Wisconsin that he requests to travel this weekend. While doing so, he complied with the conditions of his bond and the Court's orders allowing the travel.

2. Barasneh would like to again travel to Nekoosa in the Western District of Wisconsin. Undersigned counsel has previously provided the exact address of his destination to the government and to the United States Probation Office. For several days,

*Federal Defender Services  
of Wisconsin, Inc.*

he and a friend plan to enjoy the outdoors and do some spring cleaning at his friend's family's cabin.

3. Earlier today, undersigned counsel communicated with Assistant United States Attorney Ben Taibleson, who indicated that the government has no objection to Barasneh's request. United States Probation Officer Amos Malone informed counsel that his office does not oppose this request.

For these reasons, Barasneh respectfully asks this Court to amend his conditions of release to allow him to travel outside the district from Friday, May 19, 2023, to Sunday, May 21, 2023. Should the Court grant this request, Barasneh will provide any additional details requested by the probation department and will contact his agent upon return to the Milwaukee area.

Dated at Milwaukee, Wisconsin, this 18th day of May, 2023.

Respectfully submitted,

/s/ John W. Campion  
John W. Campion, WI Bar #1002697  
Federal Defender Services  
of Wisconsin, Inc.  
411 E. Wisconsin Avenue - Room 2310  
Milwaukee, WI 53202  
Tel. (414) 221-9900  
Email: john\_campion@fd.org

*Counsel for Defendant, Yousef Barasneh*